

REMARKS

Claim 37 is pending. Reconsideration of the objections and rejections is respectfully requested in view of the amendments and remarks.

The Specification has been objected to for failing to provide proper antecedent basis for the phrase “computer readable medium”.

As an initial matter, there is no requirement that the words in the claim must match those used in the specification. While the phrase “computer readable medium” does not expressly appear in the specification, it is none-the-less supported. For example, the client device processes a predetermined set of interaction components (see page 23, line 20), the interaction components being preloaded in the client device for imperative programming (see page 32, lines 12-17). Thus, the client device, which may be preloaded with interaction components is a computer readable medium essentially as claimed – at a minimum, a “computer readable medium” is an inherent component of the client device that can be preloaded with interaction components. Therefore, the claim is believed to be definite since the claimed terminology has a clear meaning – indeed the plain meaning of the phrase “computer readable medium” is consistent with the art.

Further, in establishing a disclosure, applicant may rely not only on the specification and drawing as filed but also on the original claims if their content justifies it. Original Claim 16 recited “a program storage device readable by a machine”; the claimed “computer readable medium” is merely a rephrasing of this language in the form found to be most acceptable to the USPTO.

Reconsideration of the objection is respectfully requested.

Claim 37 has been rejected under 35 USC 102(e) as being anticipated by Wilson (US 2004/0189720). The Examiner stated essentially that Wilson teaches all of the limitations of Claim 37.

Claim 37 claims, *inter alia*, “obtaining, by the client device, from a server in the distributed network a list of one or more entities in the network and a description of one or more commands associated with the one or more entities that enable user interaction with the one or more entities in the distributed network, wherein the commands are written using an interaction-based programming language which is independent of user language, access channel, client device I/O (input/output) modality, regional settings and international settings” and “processing, by the client device, the user gesture using transformation rules to map the user gesture to a relevant command of the one or more commands obtained from the server and invoking, by the client device, the relevant command on the target entity.”

Wilson teaches a perceptual user interface for controlling computer application programs and manipulating on-screen objects through hand gestures or a combination of hand gestures and verbal commands (see Abstract). Wilson does not teach “obtaining, by the client device, from a server in the distributed network a list of one or more entities in the network and a description of one or more commands associated with the one or more entities that enable user interaction with the one or more entities in the distributed network” as claimed in Claim 37. For example, Wilson merely teaches that an icon is displayed in association with a name of a specific recognized command (see paragraph [0077]). Wilson’s system is computer centric; the computer 1102 is the center of all operations – at paragraph [0109] Wilson explicitly states that “In a networked

environment, program modules depicted *relative to the computer 1102*, or portions thereof, may be stored in the remote memory storage device 1150” (emphasis added).

Further, the system of Wilson does not use commands associated with the one or more entities that enable user interaction which are written *using an interaction-based programming language* which is independent of user language, access channel, client device I/O (input/output) modality, regional settings and international settings, essentially as claimed in Claim 37. The claimed interaction-based programming language allows devices recognizing different input, including different input modalities, to communicate with the same entities. Because Wilson’s system is device centric, any entity in communication with the device must already conform to the device and its input modalities; there is no teaching of an interaction-based programming language, much less using transformation rules to map the user gesture to a relevant command of the one or more commands obtained from the server, essentially as claimed in Claim 37.

Applicants note that the Examiner has identified paragraph [0088] of Wilson are teaching “wherein the commands are written using an interaction-based programming language which is independent of user language, access channel, client device I/O (input/output) modality, regional settings and international settings” essentially as claimed in Claim 37. Applicants respectfully disagree. Paragraph [0088] of Wilson details the configurability of the device but is silent on interactions with entities using an interaction-based programming language that is independent of client device I/O (input/output) modality. Consider that, in the device centric system of Wilson, the device’s I/O are critical to functionality and include only video and audio (see FIG. 8) and further only the camera and microphone of the perceptual user interface system as shown in FIG. 2; since no device *independent* I/O are described Wilson fails to teach all of the limitations of Claim 37.

Reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the present application, including Claim 37, is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully urged.

Respectfully submitted,

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By: /Nathaniel T. Wallace/
Nathaniel T. Wallace
Reg. No. 48,909
Attorney for Applicant(s)

Mailing Address:
F. CHAU & ASSOCIATES, LLC
130 Woodbury Road
Woodbury, New York 11797
TEL: (516) 692-8888
FAX: (516) 692-8889